

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MICHAEL DAVID SILLS and MARY
SILLS,
Plaintiffs,

v.

SOUTHERN BAPTIST CONVENTION, a
non-profit corporation;
DR. ED LITTON, Individually, and as agent
and/or employee of SOUTHERN BAPTIST
CONVENTION;
LIFE WAY CHRISTIAN RESOURCES OF
THE SOUTHERN BAPTIST CONVENTION,
a non-profit corporation;
JENNIFER LYELL, Individually and as agent
and/or employee of LIFEWAY CHRISTIAN
RESOURCES OF THE SOUTHERN
BAPTIST CONVENTION and SOUTHERN
BAPTIST CONVENTION;
ERIC GEIGER, Individually and as agent
and/or employee of LIFEWAY CHRISTIAN
RESOURCES OF THE SOUTHERN
BAPTIST CONVENTION and SOUTHERN
BAPTIST CONVENTION;
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION, a
non-profit corporation;
BART BARBER, Individually and as agent
and/or employee of SOUTHERN BAPTIST
CONVENTION;
WILLIE MCLAURIN, Individually and as
agent and/or employee of SOUTHERN
BAPTIST CONVENTION and EXECUTIVE
COMMITTEE OF THE SOUTHERN
BAPTIST CONVENTION;
ROLLAND SLADE, Individually and as agent
and/or employee of SOUTHERN BAPTIST
CONVENTION and EXECUTIVE
COMMITTEE OF THE SOUTHERN
BAPTIST CONVENTION;

Case No. 3:23-cv-00478
Judge Campbell
Magistrate Judge Frensley

THE SOUTHERN BAPTIST
THEOLOGICAL SEMINARY, a non-profit
corporation;
DR. R. ALBERT MOHLER, Individually and
as agent and/or employee of THE
SOUTHERN BAPTIST THEOLOGICAL
SEMINARY and SOUTHERN BAPTIST
CONVENTION;
SOLUTIONPOINT INTERNATIONAL, INC.,
a corporation, individually and d/b/a
GUIDEPOST SOLUTIONS; and
GUIDEPOST SOLUTIONS, LLC, a limited
liability corporation and agent of the Southern
Baptist Convention,

Defendants.

**MOTION OF DEFENDANTS SOLUTIONPOINT INTERNATIONAL, INC., AND
GUIDEPOST SOLUTIONS LLC TO DISMISS PLAINTIFFS' COMPLAINT**

For the reasons set forth more fully in the accompanying Memorandum of Law, pursuant to Fed. R. Civ. P. 12(b)(1), Fed. R. Civ. P. 12(b)(2) and/or Fed. R. Civ. P. 12(b)(6), Defendants SolutionPoint International, Inc. ("SPI") and Guidepost Solutions LLC respectfully move to dismiss Plaintiffs' Complaint ("Complaint") for lack of subject matter jurisdiction, lack of personal jurisdiction (as to SPI) and/or for failure to state a claim upon which relief can be granted.

In further support of this Motion, the Declaration of Anthony M. Collura is filed contemporaneously herewith.

Respectfully submitted,

s/ John R. Jacobson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via the ECF Court System on this 12th day of July, 2023 on the following:

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